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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

ALASKA ELECTRICAL PENSION  
FUND, et al., On Behalf of Themselves  
and All Others Similarly Situated,

Plaintiffs,

vs.

PHARMACIA CORPORATION, et al.,

Defendants.

No. 03-1519 (AET)  
(Consolidated)

CLASS ACTION

DECLARATION OF SCOTT H.  
SAHAM IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT

**CONFIDENTIAL – FILED UNDER SEAL**

I, SCOTT H. SAHAM, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, one of the counsel of record for plaintiffs in the above-entitled action. I make this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment and have personal knowledge of the matters stated herein.

2. Attached are true and correct copies of the following exhibits:

Exhibit 1: Deposition Transcript of *British Medical Journal* Author Peter Juni, M.D., taken on September 21, 2010;

Exhibit 2: Deposition Transcript of Pfizer Vice President Ethan Weiner, taken on September 22, 2010;

Exhibit 3: Deposition Transcript of Defendants' Causation Expert Kenneth Lehn, taken on October 28, 2011;

Exhibit 4: Rebuttal Expert Report of Dr. Anthony Fiorino in Response to the Expert Report of Dr. Steven P. Feinstein, dated June 6, 2011;

Exhibit 5: Lehn Ex. 507 – DEFEX 005589-97;

Exhibit 6: Report on Market Efficiency, Loss Causation, and Damages, Steven P. Feinstein, Ph.D., CFA, dated June 6, 2011;

Exhibit 7: Rebuttal Report of Steven P. Feinstein, Ph.D., CFA, dated July 15, 2011;

Exhibit 8: Deposition Transcript of Pharmacia Vice President Steven Geis, taken on December 10, 2010;

Exhibit 9: Deposition Transcript of Editor and Chief of the *Journal of the American Medical Association* Catherine De Angelis, taken on January 12, 2007;

- Exhibit 10: Deposition Transcript of Editor of the *Journal of the American Medical Association* Dr. Drummond Rennie, taken on January 18, 2007;
- Exhibit 11: De Angelis Ex. 28 – DEFS 00118475-78;
- Exhibit 12: De Angelis Ex. 22 – DEFS 00500695-97;
- Exhibit 13: Deposition Transcript of the *Journal of the American Medical Association* Author Fred Silverstein, M.D., taken on September 29, 2010;
- Exhibit 14: Hassan Ex. 378 – DEFS 00508894-9080;
- Exhibit 15: Cox Ex. 336 – DEFS 01221347-64;
- Exhibit 16: Rebuttal Report of Debra Bowen, M.D., FACAAI, dated July 10, 2011;
- Exhibit 17: Deposition Transcript of Pfizer Global Candidate Team Leader Leland Loose, Ph.D., taken on August 18, 2010;
- Exhibit 18: Loose Ex. 121 – DEFS 02560155-65;
- Exhibit 19: De Angelis Ex. 27 – DEFS 01574807-17;
- Exhibit 20: Verburg Ex. 81 – DEFS 00120518-29;
- Exhibit 21: Faich Ex. 66 – DEFS 00577112-327;
- Exhibit 22: Faich Ex. 67 – DEFS 00404977-80;
- Exhibit 23: Deposition Transcript of Pfizer Medical Director Mitchell Gandelman, M.D., taken on January 20, 2011;
- Exhibit 24: Deposition Transcript of Pharmacia Associate Medical Director for Rheumatology and Pain Emilio Arbe, M.D., taken on October 19, 2010;
- Exhibit 25: Deposition Transcript of Defendants' Expert Bert Spilker, Ph.D., M.D., taken on December 20, 2011;

Exhibit 26: Deposition Transcript of Pharmacia Consultant and *Journal of the American Medical Association* Author Gerald Faich, M.D., MPH, taken on July 27, 2010;

Exhibit 27: Wahba Ex. 414 – DEFS 00122679-80;

Exhibit 28: Wolfe Ex. 13;

Exhibit 29: Zwillich Ex. 214 – DEFS 00728751-54;

Exhibit 30: Wolfe Ex. 3 – DEFS 00078878-86;

Exhibit 31: De Angelis Ex. 31;

Exhibit 32: Makuch Ex. 291 – DEFS 01714090-91;

Exhibit 33: Gandelman Ex. 305 – DEFS 01904826-28;

Exhibit 34: Verburg Ex. 82 – DEFS 01760457-537;

Exhibit 35: Geis Ex. 250 – DEFS 01348832-921;

Exhibit 36: Faich Ex. 65 – DEFS 01014862-971;

Exhibit 37: Ando Ex. 221 – DEFS 01216542-657;

Exhibit 38: Deposition Transcript of CEO of Pharmacia Fred Hassan, Volumes I and II, taken on February 22, 2011;

Exhibit 39: Deposition Transcript of Pharmacia Chief of Research and Development Dr. Goran Ando, taken on November 11, 2010;

Exhibit 40: SEC Form 4 for Goran Ando;

Exhibit 41: Loose Ex. 107 – DEFS 00563704-46;

Exhibit 42: Hassan Ex. 391 – DEFS 04133602-39;

Exhibit 43: Cox Ex. 340 – DEFS 04132395-423;

Exhibit 44: Cox Ex. 334 – DEFS 04130023-42;

Exhibit 45: Cox Ex. 335 – Metadata for DEFS 04130023-42;

- Exhibit 46: Deposition Transcript of President of Pharmacia Carrie Cox, taken on February 9, 2011;
- Exhibit 47: Ando Ex. 225 – DEFS 00109607-09;
- Exhibit 48: Makuch Ex. 290 – DEFS 01714378-411;
- Exhibit 49: Deposition Transcript of Pharmacia Consultant and *Journal of the American Medical Association* Author Lee Stuart Simon, M.D., taken on September 16, 2010;
- Exhibit 50: Deposition Transcript of Defendants' Statistical Expert Daniel Scharfstein, Ph.D., taken on November 16, 2011;
- Exhibit 51: Geis Ex. 265 – DEFS 01605472-73;
- Exhibit 52: Geis Ex. 263;
- Exhibit 53: Geis Ex. 264 – DEFS 001958;
- Exhibit 54: Cox Ex. 355;
- Exhibit 55: Cox Ex. 356;
- Exhibit 56: Cox Ex. 357 – DEFS 001962-84;
- Exhibit 57: Cox Ex. 358 – DEFS 001985-88;
- Exhibit 58: Schedule 14A for Pharmacia Corporation;
- Exhibit 59: Expert Report of Debra Bowen, M.D., FACAAI, dated May 25, 2011;
- Exhibit 60: Ando Ex. 224 – DEFS 00105709-10;
- Exhibit 61: Gandelman Ex. 324 – DEFS 01899367;
- Exhibit 62: Wolfe Ex. 15;
- Exhibit 63: Goldkind Ex. 1;
- Exhibit 64: Faich Ex. 70;

Exhibit 65: Faich Ex. 71 – DEFS 03054471-92;

Exhibit 66: Affidavit of Howard R. Philips, Deputy Director in the Division of Information Disclosure Policy, Center for Drug Evaluation and Research, United States Food and Drug Administration, dated October 18, 2010;

Exhibit 67: Expert Report Concerning Materiality, Loss Causation and Damages by Kenneth M. Lehn, dated June 7, 2011;

Exhibit 68: Wolfe Ex. 8;

Exhibit 69: De Angelis Ex. 32 – DEFS 00111312-13;

Exhibit 70: Cox Ex. 345 – FDA016266-68;

Exhibit 71: Weiner Ex. 165 – DEFS 00028999-9000;

Exhibit 72: Expert Report of Nicholas P. Jewell, Ph.D., dated May 13, 2011;

Exhibit 73: Hassan Ex. 376 – DEFS 01016539-41;

Exhibit 74: Hassan Ex. 383 – DEFS 00737706-08;

Exhibit 75: Verburg Ex. 87 – DEFS 00484693;

Exhibit 76: Deposition Transcript of Edward Gramling, taken on February 28, 2011;

Exhibit 77: SEC Forms 4 for Carrie Cox;

Exhibit 78: Hassan Ex. 380 – DEFS 04127322-25;

Exhibit 79: Loose Ex. 126 – DEFS 01380795-805;

Exhibit 80: Feinstein Ex. 1001;

Exhibit 81: Deposition Transcript of Steven Feinstein, Ph.D., taken on October 19, 2011;

Exhibit 82: Gandelman Ex. 314 – DEFS 03101545;

Exhibit 83: Wolfe Ex. 5;

- Exhibit 84: Intentionally Left Blank;
- Exhibit 85: Goldkind Ex. 2 – DEFS 03824189-234;
- Exhibit 86: Fiorino Ex. 532 – DEFEX 003862-65;
- Exhibit 87: Rebuttal Expert Report of Dr. Bert Spilker, dated July 15, 2011;
- Exhibit 88: Feinstein Ex. 1002;
- Exhibit 89: Lehn Ex. 513 – DEFEX 005603-06;
- Exhibit 90: Rebuttal Expert Report Concerning Materiality, Loss Causation and Damages by Kenneth Lehn, dated July 15, 2011;
- Exhibit 91: Deposition Transcript of Anthony Fiorino, M.D., Ph.D., taken on December 7, 2011;
- Exhibit 92: Statement of Uncontested Facts;
- Exhibit 93: Weiner Ex. 167 – DEFS 00509082-121;
- Exhibit 94: Needleman Ex. 240 – DEFS 00589404-12;
- Exhibit 95: Verburg Ex. 85 – DEFS 01311006-14;
- Exhibit 96: Verburg Ex. 86 – DEFS 01240062-75;
- Exhibit 97: Geis Ex. 254 – DEFS 03835807-16;
- Exhibit 98: SEC Forms 4 for Philip Needleman;
- Exhibit 99: SEC Form 4 for Richard De Schutter;
- Exhibit 100: Loose Ex. 113 – DEFS 00046895-900;
- Exhibit 101: Wahba Ex. 418 – DEFS 00546367-69;
- Exhibit 102: Agreement and Plan of Merger, dated as of July 13, 2002, among Pfizer Inc., Pilsner Acquisitions Sub Corp and Pharmacia Corporation;
- Exhibit 103: SEC Form S-4/A, filed on October 18, 2002;

Exhibit 104: Pfizer Inc.'s SEC Form 10-K for the fiscal year ended December 31, 2001;

Exhibit 105: Press Release: "2003: Pfizer and Pharmacia Merger";

Exhibit 106: Hassan Ex. 388 – DEFS 04132495-516;

Exhibit 107: Deposition Transcript of Debra Bowen, M.D., taken on December 16, 2011;

Exhibit 108: Defendants' Arbe Ex. 17;

Exhibit 109: Needleman Ex. 235 – DEFS 00011311-69;

Exhibit 110: Needleman Ex. 244 – DEFS 02171491-516;

Exhibit 111: FDA\_000001-03;

Exhibit 112: Verburg Ex. 84 – DEFS 01427984-8008;

Exhibit 113: Expert Report of John Abramson, M.D., dated June 1, 2011;

Exhibit 114: Verburg Ex. 77 – DEFS 00064858-941;

Exhibit 115: Portions of Faich Ex. 63 – DEFS 01629098-598;

Exhibit 116: Portions of Needleman Ex. 233 – DEFS 00577112-327;

Exhibit 117: Expert Report of Derek Patel, M.D., dated July 14, 2011;

Exhibit 118: Portions of Loose Ex. 110 – DEFS 01210614-73;

Exhibit 119: Zhao Ex. 434 – FDA\_003546-50;

Exhibit 120: Rebuttal Report of David Y. Graham, M.D., dated July 7, 2011;

Exhibit 121: Portions of Verburg Ex. 78 – DEFS 00064942-5016;

Exhibit 122: Deposition Transcript of William Zhao, taken on April 11, 2011;

Exhibit 123: Zhao Ex. 437 – DEFS 00005017-26;

Exhibit 124: Weiner Ex. 189 – DEFS 00081653-54;



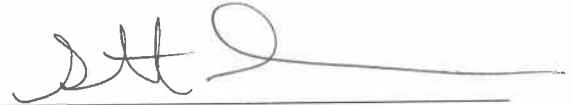
- Exhibit 125: Geis Ex. 269 – DEFS 00416486-88;
- Exhibit 126: Verburg Ex. 80 – DEFS 00886542-43;
- Exhibit 127: Weiner Ex. 181 – DEFS 00125726-30;
- Exhibit 128: Gandelman Ex. 299 – DEFS 01900331-333;
- Exhibit 129: Geis Ex. 253;
- Exhibit 130: Loose Ex. 112 – DEFS 01611729-31;
- Exhibit 131: Weiner Ex. 162 – DEFS 00170973-76;
- Exhibit 132: Portions of Loose Ex. 115 – DEFS 00723820-4033;
- Exhibit 133: Verburg Ex. 79 – DEFS 00364136-37;
- Exhibit 134: Verburg Ex. 91 – DEFS 00361809-10;
- Exhibit 135: Ando Ex. 230 – DEFS 01014313;
- Exhibit 136: Weiner Ex. 163 – DEFS 00392115-76;
- Exhibit 137: Weiner Ex. 164 – DEFS 00392205-46;
- Exhibit 138: Geis Ex. 252 – DEFS 00392275-317;
- Exhibit 139: Wolfe Ex. 12;
- Exhibit 140: Portions of DEFS 0001188-962;
- Exhibit 141: Silverstein Ex. 198 – DEFS 03835807-16;
- Exhibit 142: Loose Ex. 130 – DEFS 01433613;
- Exhibit 143: Weiner Ex. 177 – DEFS 00029027;
- Exhibit 144: Geis Ex. 268 – DEFS 00675735-40;
- Exhibit 145: Deposition Transcript of Pharmacia Scientist Kenneth Verburg, Ph.D., taken on August 6, 2010;

Exhibit 146: Simon Ex. 147 – SIMON 01268-300;  
Exhibit 147: Zhao Ex. 440 – DEFS 00537079-80;  
Exhibit 148: De Angelis Ex. 38 – DEFS 01064897-937;  
Exhibit 149: Verburg Ex. 93 – DEFS 01628309-41;  
Exhibit 150: Verburg Ex. 94 – DEFS 00874466-99;  
Exhibit 151: Zhao Ex. 439 – DEFS 01714412-48;  
Exhibit 152: Faich Ex. 68 – DEFS 01714799-801;  
Exhibit 153: Zhao Ex. 441 – DEFS 00537084-85;  
Exhibit 154: Gandelman Ex. 302 – DEFS 01899351-54;  
Exhibit 155: Gandelman Ex. 303 – DEFS 03098714-15;  
Exhibit 156: Wolfe Ex. 4 – WOLFE 00001-03;  
Exhibit 157: Gandelman Ex. 306 – DEFS 01899370-73;  
Exhibit 158: Zhao Ex. 443 – DEFS 00655210-17;  
Exhibit 159: Geis Ex. 255 – DEFS 01015664-67;  
Exhibit 160: Deposition Transcript of Pharmacia Chairman of Research and  
Development Philip Needleman, taken on December 8, 2010;  
Exhibit 161: Ando Ex. 220 – DEFS 01615044-45;  
Exhibit 162: SEC Forms 4 for Robert Shapiro;  
Exhibit 163: Loose Ex. 131 – DEFS 02561540-41;  
Exhibit 164: Strand Ex. 278 – DEFS 00109674-81;  
Exhibit 165: Strand Ex. 284 – DEFS 00112632-34;  
Exhibit 166: Loose Ex. 122 – DEFS 03256242-44;

Exhibit 167: Verburg Ex. 90 – DEFS 00156454-57;  
Exhibit 168: Geis Ex. 262 – DEFS 00754326-29;  
Exhibit 169: Hassan Ex. 401 – DEFS 01221420-36;  
Exhibit 170: Weiner Ex. 190 – DEFS 03752026-28;  
Exhibit 171: Weiner Ex. 176 – DEFS 03825679-82;  
Exhibit 172: Loose Ex. 127 – DEFS 00029316-17;  
Exhibit 173: Wolfe Ex. 9;  
Exhibit 174: Feinstein Ex. 1006;  
Exhibit 175: Drummond Ex. 47;  
Exhibit 176: Simon Ex. 156 – DEFS 03608521-50;  
Exhibit 177: De Angelis Ex. 40;  
Exhibit 178: Faich Ex. 60;  
Exhibit 179: De Angelis Ex. 34;  
Exhibit 180: Needleman Ex. 237 – DEFS02847743;  
Exhibit 181: Deposition Transcript of David Y. Graham, M.D., taken on  
December 21, 2011;  
Exhibit 182: Loose Ex. 119 – DEFS 00122861-62;  
Exhibit 183: Cox Ex. 350 – DEFS 00665397-468;  
Exhibit 184: Lehn Ex. 509 – BEAR00023-25;  
Exhibit 185: Lehn Ex. 514 – DEFEX 005572-76;  
Exhibit 186: Lehn Ex. 515 – DEFEX 009148-49;  
Exhibit 187: Lehn Ex. 517 – DEFEX 006443-46; and

Exhibit 188: Faich Ex. 58 – FAICH 00342.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 2nd day of March, 2012, at San Diego, California.

A handwritten signature in dark ink, appearing to read 'S H Saham', is written over a horizontal line.

SCOTT H. SAHAM